



PART 70

PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Operating Permit Number:

Expiration Date:

Installation ID: 071-0173

Project Number: 2002-01-134

Installation Name and Address

GDX Automotive - Danny Scott Drive
101 Danny Scott Drive
New Haven, MO 63068
Franklin County

Parent Company's Name and Address

GDX North America Inc.
P.O. Box 9067
Farmington Hills, MI 48333

Installation Description:

GDX Automotive - Danny Scott Drive manufacturers automotive sealing products. The installation is an existing major source of Hazardous Air Pollutants (HAP) and a synthetic minor source of Volatile Organic Compounds (VOC). Process operations include rubber and PVC extrusion, curing ovens, adhesive application, surface coating, and presses.

Effective Date

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION.....	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS.....	4
DOCUMENTS INCORPORATED BY REFERENCE.....	4
II. PLANT WIDE EMISSION LIMITATIONS	5
Permit Condition PW001	5
10 CSR 10-6.060	5
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	6
EU0010 through EU0300	6
Permit Condition (EU0010 through EU0300)-001	7
10 CSR 10-6.075	7
Permit Condition (EU0010 through EU0300)-002	14
10 CSR 10-5.330	14
Permit Condition (EU0010 through EU0110)-003	15
10 CSR 10-6.400	15
IV. CORE PERMIT REQUIREMENTS	17
V. GENERAL PERMIT REQUIREMENTS.....	23
PERMIT DURATION.....	23
GENERAL RECORD KEEPING AND REPORTING REQUIREMENTS	23
RISK MANAGEMENT PLANS UNDER SECTION 112(R).....	24
SEVERABILITY CLAUSE.....	24
GENERAL REQUIREMENTS	24
INCENTIVE PROGRAMS NOT REQUIRING PERMIT REVISIONS	25
COMPLIANCE REQUIREMENTS	25
PERMIT SHIELD	26
EMERGENCY PROVISIONS	26
OPERATIONAL FLEXIBILITY	26
OFF-PERMIT CHANGES.....	27
RESPONSIBLE OFFICIAL	27
REOPENING PERMIT FOR CAUSE.....	28
STATEMENT OF BASIS	28
Attachment A	29
Attachment B	30

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

GDX Automotive - Danny Scott Drive manufacturers automotive sealing products. The installation is an existing major source of Hazardous Air Pollutants (HAP) and a synthetic minor source of Volatile Organic Compounds (VOC). Process operations include rubber and PVC extrusion, curing ovens, adhesive application, surface coating and presses.

The actual emissions for the past five years from the installation are listed below:

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs) ¹
2000	0.00	--	--	6.77	--	--	0.14
2001	0.04	--	0.59	19.3	0.50	--	0.22
2002	0.07	0.01	0.92	37.8	0.78	--	1.06
2003	0.08	0.01	1.08	49.5	0.91	--	0.05
2004	0.12	0.01	1.59	28.2	1.33	--	0.04

¹ Some HAPs are reported as VOCs in the EIQ

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emit air pollutants and which are identified as having unit-specific emission limitations.

Emission Unit #	Description of Emission Unit
EU0010	Line 3 Coating Booth (SE3-CB)
EU0020	Line 4 Coating Booth #1 (E4-CB1)
EU0030	Line 4 Coating Booth #2 (E4-CB2)
EU0040	Line 5 Coating Booth (E5-CB)
EU0050	Line 6 Coating Booth (SE6-CB)
EU0060	Line 7 Coating Booth (SE7-CB)
EU0070	Line 8 Primer and Coating Spray Booth (E8-CB)
EU0080	Coating Booth 3 (CB3)
EU0085	Coating Booth 4 (CB4)
EU0090	Coating Booth 6 (CB6)
EU0095	Coating Booth 7 (CB7)
EU0100	Molding Coating Booth #1 (MCB)
EU0110	Molding Coating Booth #2 (MCB)
EU0120	Line 1 Adhesive & Flock Application (E1-FB)
EU0130	Line 1 Microwave Oven
EU0140	Line 1 Coating Curing Oven (E1-02)
EU0150	Line 2 Adhesive & Flock Application (E2-FB)
EU0160	Line 2 Coating Curing Oven (E2-02)
EU0170	Line 3 IR Oven
EU0180	Line 4 Adhesive & Flock Application (E4-FB)
EU0190	Line 4 Coating Curing Oven (E4-02)
EU0200	Line 5 Adhesive & Flock Application (E5-FB)

EU0210	Line 5 Microwave Oven
EU0220	Line5 Coating Curing Oven (E5-02)
EU0230	Line 6 IR Oven
EU0240	Line 7 IR Oven
EU0250	Line 8 Curing Oven (E8-01)
EU0260	Line 8 Adhesive and Flock Application (E8-FB)
EU0270	Corner Flocker #1 (CF)
EU0280	Corner Flocker #2 (CF)
EU0290	Polyurethane Bonding Process
EU0300	DCX Coating Booth (EP-CB9)

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

Description of Emission Source

Line 1 Rubber Extrusion (E1-X)
Line 1 Rubber Curing Oven (E1-01)
Line 1 Wash Tanks (2)
Line 2 Rubber Extrusion (E2-X)
Line 2 Rubber Curing Oven (E2-01)
Line 2 Wash Tank
Line 3 Rubber Extrusion (SE3-X)
Line 3 Salt Curing (SE3-01)
Line 3 Wash Tanks (2)
Line 4 Rubber Extrusion (E4-X)
Line 4 Rubber Curing Oven (E4-01)
Line 4 Wash Tanks (2)
Line 5 Rubber Extrusion (E5-X)
Line 5 Rubber Curing Oven (E5-01)
Line 5 Wash Tanks (2)
Line 6 Rubber Extrusion (SE6-X)
Line 6 Salt Curing (SE6-01)
Line 6 Wash Tanks (2)
Line 7 Rubber Extrusion (SE7-X)
Line 7 Salt Curing (SE7-01)
Line 7 Wash Tanks (2)
Line 8 PVC Extrusion (E8-X)
Line 8 Wash Tanks (2)
Presses
3.5 Inch Extruder
Glass Preparation System
Space Heaters
Clean up Operations (CLN)

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

1. Missouri Department of Natural Resources Construction Permit #052004-007A

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

Permit Condition PW001

10 CSR 10-6.060

Construction Permits Required

APCP Construction Permit #052004-007A

Emission Limitation:

1. GDX Automotive - Danny Scott Drive shall emit less than one hundred (100) tons of Volatile Organic Compounds (VOC) from the entire installation in any consecutive 12-month period. [\[Special Condition 2.A\]](#)
2. If a continuing situation of demonstrated nuisance odor exists in violation of 10 CSR 10-5.160, *Control of Odors in the Ambient Air*, the Director may require the permittee to submit a corrective action plan within 30 days, adequate to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of construction permit #052004-007A. [\[Special Condition 3.A\]](#)

Monitoring/Record Keeping:

The permittee shall maintain an accurate record of VOCs emitted into the atmosphere from the entire installation. Attachment A or an equivalent form approved by the Air Pollution Control Program shall be used for this purpose. The permittee shall maintain all records required by construction permit #052004-007A for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used. [\[Special Condition 2.B\]](#)

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 2(B) indicate that the source exceeds the limitation of Special Condition Number 2(A). [\[Special Condition 2.C\]](#)

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

EU0010 through EU0300			
Emission Unit #	Emission Unit Name	General Description	EQ Reference # (2004)
EU0010	Line 3 Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	SE3-CB
EU0020	Line 4 Coating Booth #1	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2002	E4-CB1
EU0030	Line 4 Coating Booth #2	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	E4-CB2
EU0040	Line 5 Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	E5-CB
EU0050	Line 6 Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	SE6-CB
EU0060	Line 7 Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter; permitted 2001	SE7-CB
EU0070	Line 8 Primer & Coating Booth	MHDR 0.95 gal/hr; PM control device - panel filter, permitted 2004	E8-CB
EU0080	Coating Booth 3	MHDR 1.80 gal/hr; PM control device - panel filter; permitted 2001	CB3
EU0085	Coating Booth 4	MHDR 1.80 gal/hr; PM control device - panel filter; permitted 2001	CB4
EU0090	Coating Booth 6	MHDR 1.80 gal/hr; PM control device - panel filter; permitted 2001	CB6
EU0095	Coating Booth 7	MHDR 1.80 gal/hr; PM control device - panel filter; permitted 2001	CB7
EU0100	Molding Coating Booth #1	MHDR 4.80 gal/hr; PM control device - panel filter; permitted 2000	MCB
EU0110	Molding Coating Booth #2	MHDR 2.70 gal/hr; PM control device - panel filter; permitted 2000	MCB
EU0120	Line 1 Adhesive & Flock Application	Drip and wipe application of adhesive to rubber parts; equipped with baghouse that is vented inside; permitted 2000	E1-FB
EU0130	Line 1 Microwave Oven	Microwave Curing Oven	NA
EU0140	Line 1 Coating Curing Oven	Hot air curing; 3.0 MMBtu/hr; natural gas fired; permitted 2000	E1-02
EU0150	Line 2 Adhesive & Flock Application	Drip and wipe application of adhesive to rubber; permitted 2002	E2-FB
EU0160	Line 2 Coating Curing Oven	Hot air curing oven; 2.5 MMBtu/hr; natural gas fired; permitted 2002	E2-02
EU0170	Line 3 IR Oven	Infrared Curing Oven	NA
EU0180	Line 4 Adhesive & Flock Application	Drip and wipe application of adhesive to rubber; permitted 2002	E4-FB
EU0190	Line 4 Coating Curing Oven	Hot air curing oven; 2.5 MMBtu/hr; natural gas fired; permitted 2001	E4-02

EU0010 through EU0300			
Emission Unit #	Emission Unit Name	General Description	EQ Reference # (2004)
EU0200	Line 5 Adhesive & Flock Application	Drip and wipe application of adhesive to rubber parts; baghouse vented inside; permitted 1999	E5-FB
EU0210	Line 5 Microwave Oven	Microwave Curing Oven	NA
EU0220	Line 5 Coating Curing Oven	Hot air curing; MHDR 2.5 MMBtu/hr; natural gas fired; permitted in 1999	E5-02
EU0230	Line 6 IR Oven	Infrared Curing Oven	NA
EU0240	Line 7 IR Oven	Infrared Curing Oven	NA
EU0250	Line 8 Curing Oven	Hot air curing; MHDR 2.5 MMBtu; natural gas fired; permitted 2004	E8-01
EU0260	Line 8 Adhesive & Flock Application	Drip and wipe application of adhesive; permitted 2004	E8-FB
EU0270	Corner Flocker #1	Manual application of adhesive to rubber with an artist brush; permitted 2000	NA
EU0280	Corner Flocker #2	Manual application of adhesive to rubber with an artist brush; permitted 2000	NA
EU0290	Polyurethane Bonding Process	System which bonds both an isocyanate component and a polyol component to glass prior to bonding PVC to the glass; permitted 2004	PVC-Bond
EU0300	DCX Coating Booth	Spritz-on coating operation; MHDR 0.0600 gal/hr; permitted 2004	CB9

Permit Condition (EU0010 through EU0300)-001

10 CSR 10-6.075

Maximum Achievable Control Technology

40 CFR Part 63 Subpart PPPP

National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts

40 CFR Part 63 Subpart A

General Provisions

Emission Limitation:

- You must limit organic HAP emissions to the atmosphere from each existing general use plastic parts and products coating operations (EU0010 through EU0030) to no more than 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used during each 12-month compliance period. [\[§63.4490\(b\)\(3\)\]](#)
 - Any coating operation(s) for which you use the compliant material option or the emission rate without add-on controls option, as specified in §63.4491(a) and (b), must be in compliance with the applicable emission limit in §63.4490 at all times. [\[§63.4500\(a\)\(1\)\]](#)
- You must always operate and maintain the affected source, including all air pollution control and monitoring equipment you use for purposes of complying with subpart PPPP, according to the provisions in §63.6(e)(1)(i). [\[§63.4500\(b\)\]](#)

Compliance Dates:

- You must comply with the standards of subpart PPPP no later than April 19, 2007. The compliance date begins the initial compliance period during which you conduct the initial compliance demonstration described in §§63.4540, 63.4550 and 63.4560. [\[§63.4483\(b\)\]](#)

2. You must meet the notification requirements in §63.4510 according to the dates specified in §63.4510 and subpart A of part 63. [\[§63.4483\(d\)\]](#)

Operating Limits & Work Practice Standards:

1. For any coating operation(s) on which you use the compliant material option or the emission rate without add-on control option, you are not required to meet any operating limits. [\[§63.4492\(a\)\]](#)
2. For any coating operation(s) on which you use the compliant material option or the emission rate without add-on control option, you are not required to meet any work practice standards. [\[§63.4493\(a\)\]](#)

Monitoring:

1. You must include all coatings (as defined in §63.4581) thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used. You must use at least one of the three compliance options listed in §63.4491(a) through (c). You may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. You may use different compliance options for different coating operations, or at different times on the same coating operation. You may employ different compliance options when different coatings are applied to the same part, or when the same coating is applied to different parts. However, you may not use different compliance options at the same time on the same coating operation. If you switch between compliance options for any coating operation or group of coating operations, you must document this switch as required by §63.4530(c), and you must report it in the next semiannual compliance report required in §63.4520. [\[§63.4491\]](#)
2. **Emission rate without add-on controls option.** You must demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used, calculated as a rolling 12-month emission rate and determined on a monthly basis. You must meet all the requirements of §§63.4550, 63.4551, and 63.4552 to demonstrate compliance with the emission limit using this option. [\[§63.4491\(b\)\]](#)
 - a) You must complete the initial compliance demonstration for the initial compliance period according to the requirements of §63.4551. The initial compliance date begins April 19, 2007 and ends the last day of May 2008. You must determine the mass of organic HAP emissions and mass of coating solids used each month and then calculate an organic HAP emission rate at the end of the initial compliance period. The initial compliance demonstration includes the calculations according to §63.4551 and supporting documentation showing that during the initial compliance period the organic HAP emission rate was equal to or less than the applicable emission limit in §63.4490. [\[§63.4550\]](#)
 - b) *Initial compliance demonstration.* To demonstrate initial compliance using the emission rate without add-on controls option, the coating operation or group of coating operations must meet the applicable emission limit of no more than 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used, but is not required to meet the operating limits or work practice standards in §§63.4492 and 63.4493, respectively. You must meet all the requirements of §63.4551. When calculating the organic HAP emission rate according to §63.4551, do not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which you use the compliant material option. You do not need to redetermine the mass of organic HAP in coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if you have documentation showing that you received back the exact same materials that were sent off-site) and reused in the coating operation for which you use the emission rate without add-on controls option. If you use coatings, thinners and/or other additives, or cleaning materials that have been reclaimed on-site, the amount of each used in a month may be reduced by the amount of each that is reclaimed. That is, the amount used may be calculated as the amount consumed to account for materials that are reclaimed. [\[§63.4551\]](#)
 - 1) *Determine the mass fraction of organic HAP for each material.* Determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month according to the requirements in §63.4541(a). [\[§63.4551\(a\)\]](#)
 - 2) *Determine the mass fraction of coating solids.* Determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during each month according to the requirements in §63.4541(b). [\[§63.4551\(b\)\]](#)
 - 3) *Determine the density of each material.* Determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM Method D1475-98,

“Standard Test Method for Density of Liquid Coatings, Inks, and Related Products” (incorporated by reference, see §63.14), information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 and other such information sources, the test results will take precedence unless, after consultation you demonstrate to the satisfaction of the enforcement agency that the formulation data are correct. If you purchase materials or monitors consumption by weight instead of volume, you do not need to determine material density. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of §63.4551. [§63.4551(c)]

- 4) *Determine the volume of each material used.* Determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If you purchase materials or monitor consumption by weight instead of volume, you do not need to determine the volume of each material used. Instead, you may use the material weight in place of the combined terms for density and volume in Equations 1A, 1B, 1C, and 2 of §63.4551. [§63.4551(d)]
- 5) *Calculate the mass of organic HAP emissions.* The mass of organic HAP emissions is the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials. Calculate the mass of organic HAP emissions using Equation 1 of §63.4551: [§63.4551(e)]

$$H_e = A + B + C - R_w \quad (\text{Eq. 1})$$

Where:

H_e = Total mass of organic HAP emissions during the month, kg.

A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 1A of §63.4551.

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 1B of §63.4551.

C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 1C of §63.4551.

R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to §63.4551(e)(4). (You may assign a value of zero to R_w if you do not wish to use this allowance.)

- A. Calculate the kg organic HAP in the coatings used during the month using Equation 1A of §63.4551: [§63.4551(e)(1)]

$$A = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(W_{c,i}) \quad (\text{Eq. 1A})$$

Where:

A = Total mass of organic HAP in the coatings used during the month, kg.

$Vol_{c,i}$ = Total volume of coating, i , used during the month, liters.

$D_{c,i}$ = Density of coating, i , kg coating per liter coating.

$W_{c,i}$ = Mass fraction of organic HAP in coating, i , kg organic HAP per kg coating. For reactive adhesives as defined in §63.4581, use the mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP.

m = Number of different coatings used during the month.

- B. Calculate the kg of organic HAP in the thinners and/or other additives used during the month using Equation 1B of §63.4551: [§63.4551(e)(2)]

$$B = \sum_{j=1}^n (Vol_{t,j})(D_{t,j})(W_{t,j}) \quad (\text{Eq. 1B})$$

Where:

B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg.

$Vol_{t,j}$ = Total volume of thinner and/or other additive, j , used during the month, liters.

$D_{t,j}$ = Density of thinner and/or other additive, j , kg per liter.

$W_{t,j}$ = Mass fraction of organic HAP in thinner and/or other additive, j , kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in §63.4581, use the

mass fraction of organic HAP that is emitted as determined using the method in appendix A to subpart PPPP.

n = Number of different thinners and/or other additives used during the month.

- C. Calculate the kg organic HAP in the cleaning materials used during the month using Equation 1C of §63.4551: [\[§63.4551\(e\)\(3\)\]](#)

$$C = \sum_{k=1}^p (Vol_{s,k})(D_{s,k})(W_{s,k}) \quad (\text{Eq. 1C})$$

Where:

C = Total mass of organic HAP in the cleaning materials used during the month, kg.

Vol_{s,k} = Total volume of cleaning material, k, used during the month, liters.

D_{s,k} = Density of cleaning material, k, kg per liter.

W_{s,k} = Mass fraction of organic HAP in cleaning material, k, kg organic HAP per kg material.

p = Number of different cleaning materials used during the month.

- D. If you choose to account for the mass of organic HAP contained in waste materials sent or designated for shipment to a hazardous waste TSDF in Equation 1 of §63.4551, then you must determine the mass according to §63.4551(e)(4)(i) through (iv). [\[§63.4551\(e\)\(4\)\]](#)

1. You may only include waste materials in the determination that are generated by coating operations in the affected source for which you use Equation 1 of §63.4551 and that will be treated or disposed of by a facility that is regulated as a TSDF under 40 CFR part 262, 264, 265, or 266. The TSDF may be either off-site or onsite. You may not include organic HAP contained in wastewater. [\[§63.4551\(e\)\(4\)\(i\)\]](#)
 2. You must determine either the amount of the waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. Do not include in the determination any waste materials sent to a TSDF during a month if you have already included them in the amount collected and stored during that month or a previous month. [\[§63.4551\(e\)\(4\)\(ii\)\]](#)
 3. Determine the total mass of organic HAP contained in the waste materials specified in §63.4551(e)(4)(ii). [\[§63.4551\(e\)\(4\)\(iii\)\]](#)
 4. You must document the methodology you use to determine the amount of waste materials and the total mass of organic HAP they contain, as required in §63.4530(h). If waste manifests include this information, they may be used as part of the documentation of the amount of waste materials and mass of organic HAP contained in them. [\[§63.4551\(e\)\(4\)\(iv\)\]](#)
- 6) Calculate the total mass of coating solids used. Determine the total mass of coating solids used, kg, which is the combined mass of coating solids for all the coatings used during each month, using Equation 2 of §63.4551: [\[§63.4551\(f\)\]](#)

$$M_{st} = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(M_{s,i}) \quad (\text{Eq. 2})$$

Where:

M_{st} = Total mass of coating solids used during the month, kg.

Vol_{c,i} = Total volume of coating, i, used during the month, liters.

D_{c,i} = Density of coating, i, kgs per liter coating, determined according to §63.4551(c).

M_{s,i} = Mass fraction of coating solids for coating, i, kgs solids per kg coating, determined according to §63.4541(b).

m = Number of coatings used during the month.

- 7) Calculate the organic HAP emission rate. Calculate the organic HAP emission rate for the compliance period, kg (lb) organic HAP emitted per kg (lb) coating solids used, using Equation 3 of §63.4551: [\[§63.4551\(g\)\]](#)

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n M_{st}} \quad (\text{Eq. 3})$$

Where:

H_{yr} = Average organic HAP emission rate for the compliance period, kg organic HAP emitted per kg coating solids used.

H_e = Total mass of organic HAP emissions from all materials used during month, y, kg, as calculated by Equation 1 of §63.4551.

M_{st} = Total mass of coating solids used during month, y, kg, as calculated by Equation 2 of §63.4551.

y = Identifier for months.

n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

- 8) *Compliance demonstration.* The organic HAP emission rate for the initial compliance period calculated using Equation 3 in §63.4551 must be less than or equal to 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used. You must keep all records as required by §§63.4530 and 63.4531. As part of the notification of compliance status required by §63.4510, you must identify the coating operation(s) for which you used the emission rate without add-on controls option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the organic HAP emission rate was less than or equal to 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used, determined according to the procedures in §63.4551. [\[§63.4551\(h\)\]](#)
- c) *Continuous compliance demonstration.* To demonstrate continuous compliance, the organic HAP emission rate for each compliance period, determined according to §63.4551(a) through (g), must be less than or equal to 0.26 kg (0.26 lb) organic HAP emitted per kg (lb) coating solids used. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4550 is the end of a compliance period consisting of that month and the preceding 11 months. You must perform the calculations in §63.4551(a) through (g) on a monthly basis using data from the previous 12 months of operation. [\[§63.4552\(a\)\]](#)
- d) If the organic HAP emission rate for any 12-month compliance period exceeded the applicable emission limit in §63.4490, this is a deviation from the emission limitation for that compliance period and must be reported as specified in §§63.4510(c)(6) and 63.4520(a)(6). [\[§63.4552\(b\)\]](#)
- e) As part of each semiannual compliance report required by §63.4520, you must identify the coating operation(s) for which you used the emission rate without add-on controls option. If there were no deviations from the emission limitations, you must submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit in §63.4490, determined according to §63.4551(a) through (g). [\[§63.4552\(c\)\]](#)
- f) You must maintain records as specified in §§63.4530 and 63.4531. [\[§63.4552\(d\)\]](#)

Record Keeping:

1. You must collect and keep records of the data and information specified in §63.4530. Failure to collect and keep these records is a deviation from the applicable standard. [\[§63.4530\]](#)
 - a) A copy of each notification and report that you submitted to comply with subpart PPPP, and the documentation supporting each notification and report. [\[§63.4530\(a\)\]](#)
 - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or mass fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [\[§63.4530\(b\)\]](#)
 - c) For each compliance period, the records specified in §63.4530(c)(1) through (4). [\[§63.4530\(c\)\]](#)
 - 1) A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used. [\[§63.4530\(c\)\(1\)\]](#)
 - 2) For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equations 1, 1A through 1C, and 2 of §63.4551 and, if applicable, the calculation used to determine

mass of organic HAP in waste materials according to §63.4551(e)(4); the calculation of the total mass of coating solids used each month using Equation 2 of §63.4551; and the calculation of each 12-month organic HAP emission rate using Equation 3 of §63.4551. [§63.4530(c)(3)]

- d) A record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the mass used. [§63.4530(d)]
 - e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period. [§63.4530(e)]
 - f) A record of the mass fraction of coating solids for each coating used during each compliance period. [§63.4530(f)]
 - g) If you use an allowance in Equation 1 of §63.4551 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.4551(e)(4), you must keep records of the information specified in §63.4530(g)(1) through (3). [§63.4530(g)]
 - 1) The name and address of each TSDF to which you sent waste materials for which you use an allowance in Equation 1 of §63.4551, a statement of which subparts under 40 CFR parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. [§63.4530(g)(1)]
 - 2) Identification of the coating operations producing waste materials included in each shipment and the month or months in which you used the allowance for these materials in Equation 1 of §63.4551. [§63.4530(g)(2)]
 - 3) The methodology used in accordance with §63.4551(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [§63.4530(g)(3)]
 - h) You must keep records of the date, time, and duration of each deviation. [§63.4530(h)]
2. The records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.4531(a)]
 3. As specified in §63.10(b)(1), you must keep each record for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.4531(b)]
 4. You must keep each record on-site for at least two (2) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). You may keep the records off-site for the remaining three (3) years. [§63.4531(c)]

Reporting:

1. *General.* You must submit the notifications in §§63.7(b) and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to you by the dates specified in those sections, except as provided in §63.4510(b) and (c). [§63.4510(a)]
2. *Initial Notification.* You must submit the initial notification required by §63.9(b) by April 19, 2005. [§63.4510(b)]
3. *Notification of compliance status.* You must submit the notification of compliance status required by §63.9(h) no later than 30 calendar days following the end of the initial compliance period described in §63.4540, §63.4550 or §63.4560 that applies to your affected source. The notification of compliance status must contain the information specified in §63.4510(c)(1) through (9) and in §63.9(h). [§63.4510(c)]
 - a) Company name and address. [§63.4510(c)(1)]
 - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.4510(c)(2)]
 - c) Date of the report and beginning and ending dates of the reporting period. The reporting period is the initial compliance period described in §63.4540, §63.4550 or §63.4560 that applies to your affected source. [§63.4510(c)(3)]
 - d) Identification of the compliance option or options specified in §63.4491 that you used on each coating operation in your affected source during the initial compliance period. [§63.4510(c)(4)]
 - e) Statement of whether or not the affected source achieved the emission limitations for the initial compliance period. [§63.4510(c)(5)]
 - f) If you had a deviation, include the information in §63.4510(c)(6)(i) and (ii). [§63.4510(c)(6)]
 - 1) A description and statement of the cause of the deviation. [§63.4510(c)(6)(i)]

- 2) If you failed to meet the applicable emission limit in §63.4490, include all the calculations you used to determine the kg (lb) organic HAP emitted per kg (lb) coating solids used. You do not need to submit information provided by the materials' suppliers or manufacturers, or test reports. [\[§63.4510\(c\)\(6\)\(ii\)\]](#)
- g) For each of the data items listed in §63.4510(c)(7)(i) through (iv) that is required by the compliance option(s) you used to demonstrate compliance with the emission limit, include an example of how you determined the value, including calculations and supporting data. Supporting data may include a copy of the information provided by the supplier or manufacturer of the example coating or material, or a summary of the results of testing conducted according to §63.4541(a), (b), or (c). You do not need to submit copies of any test reports. [\[§63.4510\(c\)\(7\)\]](#)
 - 1) Mass fraction of organic HAP for one coating, for one thinner and/or other additive, and for one cleaning material. [\[§63.4510\(c\)\(7\)\(i\)\]](#)
 - 2) Mass fraction of coating solids for one coating. [\[§63.4510\(c\)\(7\)\(ii\)\]](#)
 - 3) Density for one coating, one thinner and/or other additive, and one cleaning material, except that if you use the compliant material option, only the example coating density is required. [\[§63.4510\(c\)\(7\)\(iii\)\]](#)
 - 4) The amount of waste materials and the mass of organic HAP contained in the waste materials for which you are claiming an allowance in Equation 1 of §63.4551. [\[§63.4510\(c\)\(7\)\(iv\)\]](#)
- h) The calculation of kg (lb) organic HAP emitted per kg (lb) coating solids used for the compliance option(s) you used, as specified in §63.4510(c)(8)(i) through (iii). [\[§63.4510\(c\)\(8\)\]](#)
 - 1) For the emission rate without add-on controls option, provide the calculation of the total mass of organic HAP emissions for each month; the calculation of the total mass of coating solids used each month; and the calculation of the 12-month organic HAP emission rate using Equations 1 and 1A through 1C, 2, and 3, respectively, of §63.4551. [\[§63.4510\(c\)\(8\)\(ii\)\]](#)
4. *Semiannual compliance reports.* You must submit semiannual compliance reports for each affected source according to the requirements of §63.4520(a)(1) through (7). The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in §63.4520(a)(2). [\[§63.4520\(a\)\]](#)
 - a) *Dates.* Unless the Administrator has approved or agreed to a different schedule for submission of reports under §63.10(a), you must prepare and submit each semiannual compliance report according to the dates specified in §63.4520(a)(1)(i) through (iv). Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [\[§63.4520\(a\)\(1\)\]](#)
 - 1) The first semiannual compliance report must cover the first semiannual reporting period which begins the day after the end of the initial compliance period described in §63.4540, §63.4550 or §63.4560 that applies to your affected source and ends on June 30 or December 31, whichever date is the first date following the end of the initial compliance period. [\[§63.4520\(a\)\(1\)\(i\)\]](#)
 - 2) Each subsequent semiannual compliance report must cover the subsequent semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. [\[§63.4520\(a\)\(1\)\(ii\)\]](#)
 - 3) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [\[§63.4520\(a\)\(1\)\(iii\)\]](#)
 - 4) As an affected source that is subject to permitting regulations pursuant to 40 CFR part 70, you may submit the first and subsequent compliance reports according to the dates the permitting authority has established pursuant to 40 CFR 70.6(a)(3)(iii)(A) instead of according to the date specified in §63.4520(a)(1)(iii). [\[§63.4520\(a\)\(1\)\(iv\)\]](#)
 - b) *Inclusion with title V report.* You must report all deviations as defined in subpart PPPP in the semiannual monitoring report required by the Title V operating permit. If you submit a semiannual compliance report pursuant to §63.4520 along with, or as part of, the semiannual monitoring report required by the Title V operating permit, and the semiannual compliance report includes all required information concerning deviations from any emission limitation in subpart PPPP, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [\[§63.4520\(a\)\(2\)\]](#)
 - c) *General requirements.* The semiannual compliance report must contain the information specified in §63.4520(a)(3)(i) through (v), and the information specified §63.4520(a)(4) through (7) and (c)(1) that is applicable to your affected source. [\[§63.4520\(a\)\(3\)\]](#)
 - 1) Company name and address. [\[§63.4520\(a\)\(3\)\(i\)\]](#)

- 2) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.4520(a)(3)(ii)]
- 3) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the six (6) months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.4520(a)(3)(iii)]
- 4) Identification of the compliance option or options specified in §63.4491 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used. [§63.4520(a)(3)(iv)]
- 5) If you used the emission rate without add-on controls compliance option or the emission rate with add-on controls compliance option (§63.4491(b) or (c)), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. [§63.4520(a)(3)(v)]
- d) *No deviations.* If there were no deviations from the emission limitations in §§63.4490, 63.4492, and 63.4493 that apply to you, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. [§63.4520(a)(4)]
- e) *Deviations: Emission rate without add-on controls option.* If you used the emission rate without add-on controls option and there was a deviation from the applicable emission limit, the semiannual compliance report must contain the information in §63.4520(a)(6)(i) through (iii). [§63.4520(a)(6)]
 - 1) The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in §63.4490. [§63.4520(a)(6)(i)]
 - 2) The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of §63.4551; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to §63.4551(e)(4). You do not need to submit background data supporting these calculations (e.g., information provided by materials suppliers or manufacturers, or test reports). [§63.4520(a)(6)(ii)]
 - 3) A statement of the cause of each deviation. [§63.4520(a)(6)(iii)]

Permit Condition (EU0010 through EU0300)-002

10 CSR 10-5.330

Control of Emissions from Industrial Surface Coating Operations

Emission Limit:

The permittee shall not emit or discharge into the atmosphere volatile organic compounds (VOCs) in excess of 3.5 lb VOC/gallon of coating (less water and non-VOC organic compounds).

Monitoring:

1. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating or from data determined by an analysis of each coating, as received, by EPA Reference Method 24.
2. The permittee shall use the following procedures for determining the daily volume-weighted average (DAVG_{VW}) pounds of VOC emitted per gallon of coating (minus water and non-VOC organic compounds):
 - a) Calculate the DAVG_{VW} of all coatings used as delivered to the coating applicator(s) using the following formula:

$$DAVG_{VW} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily gal each coating used (minus water and exempt solvents) in a surface coating operation;

B = lbs VOC/gal coating (minus water and exempt solvents);

C = total daily gal coatings used (minus water and exempt solvents) in a surface coating operation; and

n = number of coatings used in a surface coating operation.

3. If the daily volume-weighted average (DAVG_{VW}) is less than 3.5 lb VOC per gallon of coating (less water and non-VOC organic compounds), the source is in compliance.

Record Keeping:

1. The permittee shall keep records detailing specific VOC sources, as necessary to determine compliance. These may include:
 - a) Daily records of the type and the quantity of coatings used daily;
 - b) The coatings manufacturer's formulation data for each coating in forms provide or approved by the director;
 - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used daily;
 - d) All test results to determine capture and control efficiencies, transfer efficiencies and coating makeup;
 - e) Daily records of the type and quantity of waste solvents reclaimed or discarded daily;
 - f) Daily records of the quantity of pieces of materials coated daily; and
 - g) Any additional information pertinent to determine compliance.
2. All records shall be maintained for a minimum of five (5) years.
3. These records shall be made available immediately for inspection to the Air Pollution Control Section of the Department of Natural Resources personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the permittee determined that the emission unit(s) exceeded the limitation listed above.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

Permit Condition (EU0010 through EU0110)-003

10 CSR 10-6.400

Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

1. Particulate matter shall not be emitted from EU0010 through EU0110 in excess of the emission rates listed in the following table:

Emission Unit	Allowable Emission Rate (lb/hr)
EU0010	0.11
EU0020	0.11
EU0030	0.10
EU0040	0.11
EU0050	0.11
EU0060	0.11
EU0070	0.11
EU0080	0.17
EU0085	0.14
EU0090	0.14
EU0095	0.17
EU0100	0.32
EU0110	0.22

2. These emission rates were calculated using the following equation:
 - a) For process weight rates of 60,000 lb/hr or less:
$$E = 4.10(P)^{0.67}$$
Where:
E = rate of emission in lb/hr
P = process weight rate in tons/hr

3. The concentration of particulate matter in the exhaust gases shall not exceed 0.30 grain per standard cubic feet of exhaust gases.

Monitoring:

1. Booths equipped with mat/panel filters (EU0010 through EU0110) shall not be operated without a filter in place.
2. The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
3. The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
4. The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Record Keeping:

1. The permittee shall maintain records of inspections of mat/panel filters when they occur.
 - a) All inspections, corrective actions, and instrument calibrations shall be recorded.
 - b) Attachment B contains a log including these record keeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this requirement.
2. All records shall be kept on-site for a minimum of five (5) years and made available to the Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the permittee determined that the emission unit(s) exceeded the limitation(s) listed above.
2. Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section IV of this permit.

Draft

IV. Core Permit Requirements

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements.

10 CSR 10-5.040, Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, or to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060, Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-5.070, Open Burning Restrictions

1. The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
2. Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
3. Any person intending to engage in open burning shall file a request to do so with the director. The request shall include the following:
 - a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
 - b) The schedule of burning operations;
 - c) The exact location where open burning will be used to dispose of the trade wastes;
 - d) Reasons why no method other than open burning is feasible; and
 - e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
4. Upon approval of the open burning permit application by the director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt GDX Automotive - Danny Scott Drive from the provisions of any other law, ordinance or regulation.
5. The permittee shall maintain files with letters from the director approving the open burning operation and previous DNR inspection reports.

10 CSR 10-5.160, Control of Odors in the Ambient Air

1. No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:
 - a) Residential, recreational, institutional, retail sales, hotel or educational premises.
 - b) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
 - c) Premises other than those in paragraphs (1)A.1. and (2) of the rule when air containing odorous matter is diluted with four or more volumes of odor-free air.

2. The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30% or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75% of those exposed if fewer than 20 people are exposed.

This requirement is not federally enforceable.

10 CSR 10-5.240, Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

1. The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:
 - a) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
 - b) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

10 CSR 10-6.050, Start-up, Shutdown and Malfunction Conditions

1. In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days in writing the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2. The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3. Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph (a.) list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a

malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

4. Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5. Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060, Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065, Operating Permits

The permittee shall file for renewal of this operating permit no sooner than eighteen months, nor later than six months, prior to the expiration date of this operating permit. The permittee shall retain the most current operating permit issued to this installation on-site and shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants
40 CFR Part 61 Subpart M, National Emission Standard for Asbestos

1. The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, and National Emission Standard for Asbestos.
2. The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.100, Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.110, Submission of Emission Data, Emission Fees and Process Information

1. The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
2. The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
3. The fees shall be due April 1 each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the director.

10 CSR 10-6.130, Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150, Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

1. The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line or origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director;
2. The permittee shall not cause nor allow any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3. Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary.

10 CSR 10-6.180, Measurement of Emissions of Air Contaminants

1. The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
2. The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
3. The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-6.250, Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

10 CSR 10-6.280, Compliance Monitoring Usage

1. The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;

- b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the director.
2. Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
- a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
- a) Applicable monitoring or testing methods, cited in:
 - 1) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - 2) 10 CSR 10-6.040, "Reference Methods";
 - 3) 10 CSR 10-6.070, "New Source Performance Standards";
 - 4) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

Title VI – 40 CFR Part 82, Protection of Stratospheric Ozone

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
- a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5. The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR part 82*

Draft

V. General Permit Requirements

Permit Duration

10 CSR 10-6.065(6)(C)1.B.

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

General Record Keeping and Reporting Requirements

10 CSR 10-6.065(6)(C)1.C

1. Record Keeping

- a) All required monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

2. Reporting

- a) The permittee shall submit a report of all required monitoring by:
 - 1) October 1st for monitoring which covers the January through June time period, and
 - 2) April 1st for monitoring which covers the July through December time period.
 - 3) Exception: Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- b) Each report must identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
- c) All reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
- d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - 1) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if you wish to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and that you can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
 - 2) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
 - 3) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in the permit.
 - 4) These supplemental reports shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

Risk Management Plans Under Section 112(r)

10 CSR 10-6.065(6)(C)1.D.

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

1. June 21, 1999;
2. Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
3. The date on which a regulated substance is first present above a threshold quantity in a process.

Severability Clause

10 CSR 10-6.065(6)(C)1.F.

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

General Requirements

10 CSR 10-6.065(6)(C)1.G

1. The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2. The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
3. The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, will not stay any permit condition.
4. This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5. The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

Incentive Programs Not Requiring Permit Revisions

10 CSR 10-6.065(6)(C)1.H.

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

Compliance Requirements

10 CSR 10-6.065(6)(C)3.

1. Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3. All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4. The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, Kansas 66101, as well as the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification,
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation,
 - c) Whether compliance was continuous or intermittent,
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period, and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

Permit Shield

10 CSR 10-6.065(6)(C)6.

1. Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The applicable requirements are included and specifically identified in this permit; or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
2. Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of section 303 of the Act or section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The administrator's authority to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

Emergency Provisions

10 CSR 10-6.065(6)(C)7.

1. An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7. shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
2. Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Operational Flexibility

10 CSR 10-6.065(6)(C)8.

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program and the Administrator at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that established an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1. Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable

requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.

- a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program and to the Administrator, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and this agency shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and this agency at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, The permittee shall provide notice to the administrator and the permitting authority as soon as possible after learning of the need to make the change.
- b) The permit shield shall not apply to these changes.

Off-Permit Changes

10 CSR 10-6.065(6)(C)9.

1. Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision, if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the permitting authority and to the administrator no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under paragraph (6)(B)3. of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
 - d) The permit shield shall not apply to these changes.

Responsible Official

10 CSR 10-6.020(2)(R)12.

The application utilized in the preparation of this was signed by David J Maggs, Plant Manager. The Air Pollution Control Program has been informed that Mr. Maggs **Error! Reference source not found.** is no longer the responsible official and Mr. Jim Eichelberger, Plant Manager is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

Reopening Permit For Cause

10 CSR 10-6.065(6)(E)6.

In accordance with 10 CSR 10-6.065(6)(E)6.A., this permit may be reopened with cause if:

1. The Missouri Department of Natural Resources receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
2. The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
3. Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if the permit has a remaining term of less than three years, the effective date of the requirement is later than the date on which the permit is due to expire, or the additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
4. The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
5. The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

Statement of Basis

10 CSR 10-6.065(6)(E)1.C.

This permit is accompanied by a statement setting forth the legal and factual basis for the draft permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

Attachment A

VOC Emissions Worksheet

This record keeping sheet or an equivalent form may be used for the record keeping requirements of Permit Condition PW001.

This sheet covers the date of _____.

[illegible]

1. Column C = ($\rho_{H_2O} \times SG$); ρ_{H_2O} (density of H₂O)= 8.34 lb/gal; SG (specific gravity) is obtained from MSDS
2. Column D = Volatile percentage by weight of the material, obtained from MSDS
3. Column E = The Emission Factors for the paint/solvent can be used instead of Columns C and D
4. Column F = $\left(\frac{(Column\ B \times Column\ C)}{2000} \times \frac{Column\ D}{100} \right) OR \left(\frac{(Column\ B \times Column\ E)}{2000} \right)$
5. Column G = Rolling 12-month total from previous worksheets plus Column F

A 12-month VOC emissions total of less than 100 tons indicates compliance.

Inspection/Maintenance/Repair/Malfunction Log

This record keeping sheet or an equivalent form may be used to record inspections of equipment, maintenance, repairs and malfunctions.

[illegible]

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

1. Part 70 Operating Permit Application, received 1/30/2002; revised 12/3/2002;
2. 2003 Emissions Inventory Questionnaire, received 02/02/2004;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-5.040, *Use of Fuel in Hand-Fired Equipment Prohibited*

This regulation was included as a core permit requirement for all installations in the St. Louis Metropolitan area.

10 CSR 10-5.240, *Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area*

This regulation was included as a core permit requirement for all installations in the St. Louis Metropolitan area.

10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations*

The installation is subject to 40 CFR, Subpart PPPP, *Surface Coating of Plastic Parts and Products* which defines a plastic part or product as “any piece or combination of pieces of which at least one has been formed from one or more resins. Such pieces may be solid, porous, flexible or rigid.” Since rubber is formed from a resin, it meets the Subpart PPPP definition of a plastic. 10 CSR 10-5.330 regulates the surface coating of plastic parts but does not define plastic part. Therefore the subpart PPPP definition is used which makes 10-5.330 applicable to the installation.

10 CSR 10-6.100, *Alternate Emission Limits*

This regulation was included as a core permit requirement for all installations in Missouri.

10 CSR 10-6.250, *Asbestos Abatement Projects – Certification, Accreditation and Business Exemption Requirements*

This regulation was included as a core permit requirement for all installations in Missouri.

10 CSR 10-6.280, *Compliance Monitoring Usage*

This regulation was included as a core permit requirement for all installations in Missouri.

40 CFR Part 63, Subpart PPPP, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts*

This rule was not listed in the application but is applicable to the installation (see 10 CSR 10-5.330 explanation above). The permittee must comply with the standards of subpart PPPP no later than April 19, 2007.

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-5.520, *Control of Volatile Organic Compound Emissions from Existing Major Sources*

The installation is a synthetic minor source of VOC and therefore is not subject to this regulation.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule was marked as applicable in the permit application. However, combustion units that use exclusively pipeline grade natural gas, as defined in 40 CFR 72.2, are exempt from this rule.

NSPS Applicability

None

MACT Applicability

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

This standard does not apply because GDX Automotive - Danny Scott Drive does not use any cleaning solvents in the list of applicable solvents for subpart T.

40 CFR Part 63, Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*

According to §63.7505(c)(4), existing small gaseous fuel boilers and process heaters are not subject to the initial notification requirements in §63.9(b) and are not subject to any requirements in subpart DDDDD or in subpart A of part 63. Small gaseous fuel subcategory includes any boiler or process heater that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only during periods of gas curtailment or gas supply emergencies, and has a rated capacity of less than or equal to 10 MMBtu per hour heat input. All process heaters at GDX Automotive - Danny Scott Drive meet the definition of small gaseous fuel category and are therefore not subject to any requirements in subpart DDDDD or in subpart A of part 63.

40 CFR Part 63, Subpart PPPP, *National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts*

This standard applies to the installation. The permittee must comply with the standards of subpart PPPP no later than April 19, 2007.

NESHAP Applicability

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*

This rule applies to the installation because of the renovation and demolition parts of the subpart, which make the subpart applicable to all sources. It was included as a core permit requirement.

CAM Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that meets all of the following:

- Be subject to an emission limitation or standard, and
- Use a control device to achieve compliance, and
- Have pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units have precontrol emissions that exceed or are equivalent to the major source threshold.

Other Regulatory Determinations

10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

It is highly unlikely that emissions from the natural gas curing ovens will result in an exceedance of 10 CSR 10-5.030. Therefore, this rule was not applied to the curing ovens.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Process*

This rule applies to the following equipment, and the calculations below verify compliance for both the PM Emission Rate and the PM Concentration for the listed emission units provided that the required control devices are in operation and working properly:

PM Emission Rate Compliance

MHDR (ton/hr) = MHDR (gal/hr) * Density (lb/gal) * (ton/2000 lb)

Emission Rate (lb/hr) = MHDR (ton/hr) * (% solids/100 * 2000 lb/ton) * (1-Transfer Eff/100)*(1-(Overall Control Eff/100))

Emission Unit ID	MHDR (gal/hr)	Density (lb/gal)	MHDR (ton/hr)	% solids	Capture Efficiency (%)	Control Efficiency (%)	Transfer Efficiency (%)	Potential Controlled Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)
EU0010	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0020	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0030	0.95	7.7	0.0037	29	95	99.5	75	0.03	0.10
EU0040	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0050	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0060	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0070	0.95	9.24	0.0044	50	95	99.5	75	0.06	0.11
EU0080	1.80	9.24	0.0083	50	95	99.5	75	0.11	0.17
EU0085	1.80	7.28	0.0066	50	95	99.5	75	0.09	0.14
EU0090	1.80	7.28	0.0066	50	95	99.5	75	0.09	0.14
EU0095	1.80	9.24	0.0083	50	95	99.5	75	0.11	0.17
EU0100	4.80	9.24	0.0222	50	95	99.5	75	0.30	0.32
EU0110	2.70	9.24	0.0125	50	95	99.5	75	0.17	0.22

PM Concentration Compliance

Emission rate (gr/dscf) = Emission Rate (lb/hr)*7000 (grains/lb)/Stack flow rate (SCFM)/60(min/hr)

Flow rates converted from actual to standard conditions using the ideal gas law.

Emission Unit ID	Potential Controlled PM Emission Rate (lb/hr)	Stack Temp °F	Stack Flow Rate		Potential Concentration (gr/scf)	Allowable Concentration (gr/scf)
			ACFM	SCFM		
EU0010	0.06	77	10,084	9,915	0.001	0.30
EU0020	0.06	77	10,084	9,915	0.001	0.30
EU0030	0.03	77	10,084	9,915	0.0003	0.30
EU0040	0.06	77	6,742	6,629	0.001	0.30
EU0050	0.06	77	10,084	9,915	0.001	0.30
EU0060	0.06	77	6,742	6,629	0.001	0.30
EU0070	0.06	77	10,084	9,915	0.001	0.30
EU0080	0.11	77	19,500	19,173	0.001	0.30
EU0085	0.09	77	19,500	19,173	0.001	0.30
EU0090	0.09	77	19,500	19,173	0.001	0.30
EU0095	0.11	77	19,500	19,173	0.001	0.30
EU0100	0.30	77	10,084	9,915	0.004	0.30
EU0110	0.17	77	10,084	9,915	0.002	0.30

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Process*

Extruders

10 CSR 10-6.400 was not applied to the extruders because each unit has the uncontrolled potential to emit less than 0.5 lbs/hr of particulate matter and is therefore exempt according to §(1)(B)11.

Emission Point	Associated Equip.	Process Weight Rate (ton/hr)	PM Emission Factor (lb/ton)	Emission Factor (EF) Reference	Potential Uncontrolled Emission Rate (lb/hr)
E1-X	Line 1 Rubber Extrusion	0.58	2.0×10^{-8}	2004 EIQ	1.16×10^{-8}
E2-X	Line 2 Rubber Extrusion	0.36	2.0×10^{-8}	2004 EIQ	7.2×10^{-9}
SE3-X	Line 3 Rubber Extrusion	0.32	2.0×10^{-8}	2004 EIQ	6.4×10^{-9}
E4-X	Line 4 Rubber Extrusion	0.58	2.0×10^{-8}	2004 EIQ	1.16×10^{-8}
E5-X	Line 5 Rubber Extrusion	0.58	2.0×10^{-8}	2004 EIQ	1.16×10^{-8}
SE6-X	Line 6 Rubber Extrusion	0.36	2.0×10^{-8}	2004 EIQ	7.2×10^{-9}
SE7-X	Line 7 Rubber Extrusion	0.35	2.0×10^{-8}	2004 EIQ	7.0×10^{-9}
E8-X	Line 8 PVC Extruder	0.0601	2.0×10^{-8}	Assumed EF for PVC extruder equivalent to EF of rubber extruder	1.2×10^{-9}

Flock Booths (EU0120, EU0150, EU0180, EU0200, EU0260)

The adhesive and flock application is a two part process. In the first part of the process, referred to as the "flock booth", a hose drips adhesive on the rubber/PVC and the adhesive is spread with paint brushes. In the second part of the process, the rubber/PVC is conveyed to the "flock house" where polyester flock is shaken onto the rubber/PVC parts and an electrostatic charge is applied. There are baghouse systems installed which are designed to collect flock during this part of the process. These baghouses are considered process equipment and exhaust within the building. There are no stacks or vents in the "flock house." Consequently, minimal particulate emissions would be expected from the application of adhesives and flock, and, therefore 10-6.400 was not applied.

Curing Ovens

The curing ovens may emit air contaminants from the associated operations in addition to the products of combustion. However, it is highly unlikely that emissions will result in an exceedance of 10 CSR 10-6.400. Therefore, this rule was not applied to these emission units.

Corner Flockers #1 and #2 (EU0270 & EU0280)

The corner flocker processes entails GDX Automotive personnel using an artist brush to apply flock manually from a small cup. There are no PM emissions from this process. Therefore and 10 CSR 10-6.400 was not applied to these emission units.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).

Prepared by:

Jason Dickneite
Environmental Engineer

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David J. Maggs, Plant Manager
GDX Automotive – Danny Scott Drive
101 Danny Scott Drive
New Haven, MO 63068

Re: GDX Automotive - Danny Scott Drive, 071-0173
Permit Number:

Dear Sir/Madam:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation, in accordance with the rules and regulations cited in this document, is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:jdk

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII
St. Louis Regional Office
PAMS File: 2002-01-134

CERTIFIED MAIL, 70041160000081717036
RETURN RECEIPT REQUESTED

Mr. Robert Dryden
GDx Automotive – Danny Scott Drive
101 Danny Scott Drive
New Haven, MO 63068

Re: Draft Part 70 Operating Permit – Project No: 2002-01-134

Dear Mr. Dryden:

The Air Pollution Control Program (APCP) has completed the preliminary review of your Part 70 (Title V) permit application. A public notice will be placed in the New Haven Leader on June 21, 2006.

The APCP will accept comments regarding the draft permit that are postmarked on or before the closing date. It is very important that you read and understand this legal document. You will be held responsible for complying with this document.

Please address comments or recommendations for changes to my attention at:

Operating Permits Unit
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102

A copy of this draft has also been sent to the U.S. EPA's Region VII office in Kansas City for their review. The Region VII office is afforded, by law, oversight authority on any Title V permit which Missouri (or any of the other states in the region) may propose to issue. A public hearing may be held if interest is expressed by the public.

Should you have any questions, or wish clarification on any items in this draft permit, please feel free to contact me at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Jason Dickneite
Environmental Engineer

JD/kdm

Enclosures

c: Ms. Tamara Freeman, US EPA Region VII
St. Louis Regional Office
PAMS File: 2002-01-134

Ms. Laurel L. Kroack, Chief, Bureau of Air
Illinois Environmental Protection Agency
Division of Air Pollution Control
PO Box 19276
1021 North Grand Avenue East
Springfield, MO 62702

RE: Affected States Review – Notification of Proposed Final Part 70 Operating Permit

Dear Ms. Kroack:

In accordance with Missouri State Rule 10 CSR 10-6.065(6)(F)1. and the Clean Air Act this letter is to notify you of public notice of the preliminary draft and request for comments for:

GDx Automotive - Danny Scott Drive located in New Haven, MO

Project Number - 2002-01-134

Public notice will be published in the New Haven Leader in New Haven, MO on June 21, 2006.

You are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits in writing by no later than July 21, 2006 to my attention at Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Should you require further information or documentation on this matter, please contact the Operating Permits Unit at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS:jdk

St. Louis Regional Office
PAMS File: 2002-01-134

For Publication on Wednesday, June 21, 2006

Notice of documents available for public viewing
Department of Natural Resources
Air and Land Protection Division
Air Pollution Control Program

A draft-operating permit has been issued for the following air pollution sources:

Installation	City	Project #
GDX Automotive – Danny Scott Drive	New Haven	2002-01-134

Activities included in these permits are all activities involved in the operation of these sources with the potential for producing regulated quantities of regulated air pollutants.

Copies of the draft permits are available for public comment. Public files containing copies of all non-confidential materials and a copy or summary of other materials, if any, considered in this draft permit, are available for public viewing at the following locations: MO Dept. of Natural Resources, St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125 or by written request from the Air Pollution Control Program, Operating Permits Unit, P.O. Box 176, Jefferson City, MO 65102 (Any information deemed confidential business information pursuant to Missouri State Rule 10 CSR 10-6.210, *Confidential Information*, if any exists, are not included in the public files. Emission data, as defined by this rule, cannot be considered confidential business information.)

The file is available for viewing through July 20, 2006. Citizens are invited to submit any relevant information, materials, and views in support of or in opposition to the draft operating permits in writing no later than July 20, 2006. Written comments and/or requests for public hearing should be sent to Mr. Jim Kavanaugh, Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

The Air Pollution Control Program will hold an informal public hearing after an additional 30 day comment period on the draft permit if: 1.) A timely request is made for such a hearing during the public comment period; and 2.) The person requesting the hearing identifies material issues concerning the preliminary determination and the Air Pollution Control Program determines that a public hearing will be useful in resolving those issues.

This public notice is made pursuant to Missouri State Rule 10 CSR 10-6.065, Operating Permits.

New Haven Leader
403 Charles Cook Plaza
PO Box 168
New Haven, MO 63068

Attention: Legal Ads

To Whom It May Concern:

We wish to place the attached legal advertisement in your newspaper to be run ONCE. It must run on Wednesday, June 21, 2006.

We require a certified affidavit of publication. This must be received in our office by July 5, 2006. Please submit the affidavit and invoice for payment to:

Attention: Cheri Bechtel
Department of Natural Resources
Air Pollution Control Program
P. O. Box 176
Jefferson City, MO 65102

If you have any questions, please contact me at (573) 751-4817. Thank you for your assistance.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permits Unit Chief

MJS/jdk

c: Cheri Bechtel, Procurement Clerk
PAMS File: 2002-01-134

MISSOURI DEPARTMENT OF NATURAL RESOURCES FOLDER TRANSMITTAL ROUTING SHEET		Document #: Division Log #: Program Log #:
DEADLINE: Date Penalty for Missing Deadline: None		
GDX Automotive – Danny Scott Drive		2002-01-134
Originator: Jason Dickneite		Telephone: 1-8329
Typist: Karla Marshall		Date:
File Name: P:\APCP\Permits\Users\Jason Dickneite\Projects\Part 70 Initial\GDX Automotive (2002-01-134).doc		
FOR SIGNATURE APPROVAL OF:		
<input type="checkbox"/> DNR Director <input type="checkbox"/> DNR Deputy Director <input type="checkbox"/> Division Director <input type="checkbox"/> Division Deputy Director X Other: James Kavanaugh		
PROGRAM APPROVAL: Approved by: _____ Program: <u>APCP</u> Date: _____		
Other Program Approval (Section/Unit): _____ Date: _____		
Comments: _____		
ROUTE TO:		
<input type="checkbox"/> DIVISION DIRECTOR APPROVAL: _____		Date: _____
Comments: _____		
<input type="checkbox"/> FINANCIAL REVIEW – DIVISION OF ADMINSTRATIVE SUPPORT:		
DAS Director: _____		Date: _____
<input type="checkbox"/> Fee Worksheet Received By: _____		Date: _____
Accounting: _____		Date: _____
Budget: _____		Date: _____
General Services: _____		Date: _____
Internal Audit: _____		Date: _____
Purchasing: _____		Date: _____
Comments: _____		
<input type="checkbox"/> LEGAL REVIEW:		
<input type="checkbox"/> General Counsel: _____		Date: _____
<input type="checkbox"/> AGO: _____		Date: _____
Comments: _____		
<input type="checkbox"/> DEPARTMENT DIRECTOR APPROVAL: _____		Date: _____
Comments: _____		
<input type="checkbox"/> NOTARIZATION NEEDED		
		INITIALS/DATE